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ATTORNEY FOR RYAN BUNDY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	3:16-CR-00051-BR
vs.)	
)	
RYAN BUNDY,)	DECLARATION OF
)	COUNSEL IN SUPPORT
)	OF MOTION TO WITHDRAW
Defendant.)	
)	

Counsel declares in support of his Motion to Withdraw the following:

(1) On January 27, 2016, counsel was appointed to represent Ryan Bundy on charges of Conspiracy to Impede Officers of the United States; Possession of Firearms and Dangerous Weapons in Federal Facilities; Use and Carry of a Firearm in Relation to a Crime of Violence; and Theft of Government Property.

(2) Counsel can no longer ethically represent Mr. Bundy as the attorney / client relationship has completely broken down. Counsel believes that it is in the best interest of Mr. Bundy for the court to appoint him a new attorney.

(3) Mr. Bundy is requesting that the court allow him to represent himself. A Feretta hearing is scheduled for March 18, 2016, to make a determination on self-representation. Should the court allow Mr. Bundy to represent himself, it is anticipated that the court will want stand-by counsel appointed to assist Mr. Bundy. The Federal Defender's office has agreed to have a CJA attorney present at that hearing who is willing to be appointed counsel or stand-by counsel on behalf of Mr. Bundy.

(4) A trial date is anticipated to be scheduled for early September, 2016, allowing adequate time for newly appointed counsel to prepare for trial or otherwise represent Mr. Bundy's interest as stand-by counsel.

(5) Counsel has notified the government as well as the office of the federal defender of his intent to withdraw from the case and seek new representation for Mr. Bundy.

DATED this 12th day of March, 2016.

Respectfully Submitted,

/s/ Andrew Bates

Andrew Bates

Attorney for Defendant